

Exhibit D

MEMORANDUM

PRIVILEGED & CONFIDENTIAL

TO: Michael Avenatti
FROM: Jeffrey Auerbach
SUBJECT: Memorandum of Actions RE Nike EYB-California Supreme w/Exhibits
DATE: March 18, 2019

Michael attached is a copy of Memorandum of Actions document Regarding Nike Elite Youth Basketball-California Supreme Youth Basketball in Connection with Nike Elite Players Deandre Ayton, Bol Bol and Brandon McCoy in 2016 and 2017 with exhibits.

This is one we shared with you at our initial meeting with bank statements, texts, invoices, phone records, etc.



Memorandum of Actions Regarding Nike Elite Youth Basketball-California Supreme Youth Basketball in Connection with Nike Elite Players Deandre Ayton, Bol Bol and Brandon McCoy in 2016 and 2017

The actions listed below were initiated, authorized and directed by Nike Elite Youth Basketball (Nike EYB) executives Carlton DeBose in 2016, and Carlton DeBose and Jamal James in 2017, and carried-out on Nike's behalf by Gary Franklin/California Supreme Youth Basketball (CA Supreme):

2016 Actions

The following Nike EYB actions and payments in 2016 were in connection with Nike EYB players, DeAndre Ayton, who went on to play at the University of Arizona and was the 1st overall pick in the 2018 NBA Draft by the Phoenix Suns; and Brandon McCoy, a five-star recruit, ranked #15 nationally in the Class of 2017 by ESPN, and went on to play at UNLV:

1. \$28,000 bank-wire payment on 4/4/2016 to Melvin McDonald, Nike EYB player DeAndre Ayton's "handler," via McDonald's non-profit 501c3, American All-Star Basketball (See Exhibit 2016-1A).
2. A falsified invoice for \$60,000 submitted to Nike EYB on 6/20/2016 to cover the following payments (a-d) totaling \$60,000 (See Exhibits 2016-2A-D):
 - a. \$30,000 to Melvin McDonald, Nike EYB player DeAndre Ayton's "handler".
 - b. \$15,000 to AAU basketball coach Shaun Manning, Nike EYB player Brandon McCoy's "handler".
 - c. \$10,000 to Andrea Ayton, mother of DeAndre Ayton
 - d. \$5,000 for travel expenses related to DeAndre Ayton's family
3. \$10,000 cash paid to Andrea Ayton, DeAndre Ayton's Mother, in Phoenix, AZ on 6/29/2016 (See Exhibits 2016-3A-D).
4. \$10,000 check (of \$15,000 total) paid to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler," on 7/1/2016 (See Exhibits 2016-4A-B).
5. \$2,500 cash paid to AAU basketball coach, Shaun Manning, Nike elite player Brandon McCoy's "handler," on 7/18/2016 (See Exhibits 2016-5A-C).
6. \$5,000 paid (approximately) with California Supreme credit cards for travel expense charges between 7/5/2016 – 7/11/2016 in connection with DeAndre Ayton's family members travel.

Memorandum of Actions by Nike EYB/CA Supreme
Page Two

(2016 continued)

7. \$2,500 cash paid to AAU basketball coach, Shaun Manning, Nike elite player Brandon McCoy's "handler," on 8/10/2016 (See Exhibits 2016-7A-C).

2017 Actions

The following Nike EYB actions and payments in 2017 were in connection with Nike EYB player, Bol Bol, ranked #4 nationally in the Class of 2018, and who now plays at the University of Oregon, with the intention of entering the 2019 NBA Draft:

1. \$29,528.43 bank-wire on 4/11/2017 to Melvin McDonald, Nike EYB player Bol Bol's "handler," via McDonald's non-profit 501c3, American All-Star Basketball (See Exhibits 2017-1A-B).
2. A falsified invoice for \$15,000 submitted to Nike EYB on 6/12/17 to cover an additional \$15,000 in payments to Melvin McDonald, Nike EYB player Bol Bol's "handler" (See Exhibits 2017-2A-D).
3. \$12,500 bank-wire payment on 6/28/2017 to Melvin McDonald, Nike EYB player Bol Bol's "handler," via McDonald's non-profit 501c3, American All-Star Basketball (See Exhibits 2017-3A-B).

Memorandum of Actions
Nike Elite Youth Basketball-California Supreme Youth Basketball

EXHIBITS:

2016 1-7

2017 1-3

2016-1 Action

1. \$28,000 bank-wire payment on 4/4/2016 to Melvin McDonald, Nike EYB player DeAndre Ayton's "handler," via his non-profit 501c3, American All-Star Basketball.

Exhibits

Exhibit 2016-1A: California Supreme Bank of America statement confirms ATM Deposit of Nike check for \$30,000 on 4/4/2016 (to cover same-day \$28,000 bank wire payment to Melvin McDonald, Nike EYB player DeAndre Ayton's "handler," via McDonald's non-profit 501c3, American All-Star Basketball) (See Exhibit 2016-1B).

Exhibit 2016-1B: California Supreme Bank of America statement confirms \$28,000 bank-wire payment on 4/4/2016 to Melvin McDonald's non-profit 501c3, American All-Star Basketball at Wells Fargo Bank.

(Nike Elite Youth Basketball, California Supreme Youth Basketball, DeAndre Ayton, Melvin McDonald)

(Exhibit 2016-1A)

**CALIFORNIA SUPREME BASKETBALL**

April 1, 2016 to April 30, 2016

Your checking account

Deposits and other credits

Date	Description	Amount
04/04/16	BKOFAMERICA ATM 04/02 [REDACTED] DEPOSIT EL SEGUNDO EL SEGUNDO CA	30,000.00
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

[illegible]

continued on the next page



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Online Alerts¹ help keep you informed.

- Monitor your account balances and receive alerts when payments are due
- Be notified when transactions have cleared

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*Alerts received as text messages on your mobile access device may incur a charge from your mobile access service provider. This feature is not available on the Mobile website. Wireless carrier fees may apply. | ARSXXMCP | SSM-01-16-8548.B

(Exhibit 2016-1B)

**CALIFORNIA SUPREME BASKETBALL**

April 1, 2016 to April 30, 2016

Your checking account

Deposits and other credits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

[illegible]

continued on the next page



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2016-2 Action

1. A falsified invoice for \$60,000 submitted to Carlton DeBose/Nike EYB on 6/20/2016 to cover the following payments totaling \$60,000:
 - a. \$30,000 to Melvin McDonald, Nike EYB player DeAndre Ayton's "handler".
 - b. \$15,000 to AAU basketball coach Shaun Manning, Nike EYB player Brandon McCoy's "handler".
 - c. \$10,000 to Andre Ayton, DeAndre Ayton's mother
 - d. \$5,000 for travel expenses related to DeAndre Ayton's family

Exhibits

Exhibit 2016-2A: Falsified invoice for \$60,000 submitted to Carlton DeBose/Nike EYB on 6/20/2016 by California Supreme, requesting a) \$30,000 for 16U & 15U Travel Expenses and b) \$30,000 for CA Supreme Back to School Event.

Exhibit 2016-2B: California Supreme Bank of America statement confirms \$60,000 credit received by California Supreme (Nike direct-deposit) in connection with falsified invoice (See Exhibit 2016-2A). Funds were used to cover above-referenced payments.

Exhibit 2016-2C: Text message on 6/20/2016 between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme), in which DeBose directed Franklin to send DeBose/Nike EYB an invoice for \$60,000 and include line items for 16U, 15U expenses, \$30,000 for CA Supreme Back to School Event Sponsorship.

Exhibit 2016-2D: Text message 6/2016 between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) in which DeBose confirmed Nike invoicing and paying AAU basketball coach Shaun Manning, Nike EYB player Brandon McCoy's "handler".

(Nike Elite Youth Basketball, California Supreme Youth Basketball, DeAndre Ayton, Andrea Ayton, Shaun Manning, Brandon McCoy, Melvin McDonald)

(Exhibit 2016-2A)

Invoice**California Supreme Basketball**

Bill To: NIKE Inc
 One Bowerman Drive Beaverton, OR 97005
 NIKE Inc Attn: Carlton DeBose

Invoice No: 2
Date: June 20, 2016
Terms: NET 0
Due Date: June 20, 2016

Description	Quantity	Rate	Amount
**16U & 15U Travel Expenses \$30,000	1	\$60,000.00	\$60,000.00
**Cal Supreme Back To School Event \$30,000			

* Includes non-resale tax

Attn: Carlton DeBose Nike Inc

Subtotal	\$60,000.00
Includes TAX (0.00%)	\$0.00
Total	\$60,000.00
Paid	\$0.00

Balance Due	\$60,000.00
--------------------	--------------------

(Exhibit 2016-2B)



Your checking account

CALIFORNIA SUPREME BASKETBALL

June 1, 2016 to June 30, 2016

Deposits and other credits

Date	Description	Amount
06/27/16	Counter Credit	60,000.00

Withdrawals and other debits

[illegible]

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ARLN38SQ SSM-02-16-0222B

(Exhibit 2016-2C)

Carlton DeBose (grey)
Gary Franklin (yellow)

Sprint

11:04 PM

22%

Done

12 of 16

Carlton DeBose - Nike Grossroot...

708

Product will be there next
week. Sit tight.

12:27 PM

12:36 PM Ok

Sunday, June 19, 2016

HAPPY FATHER'S DAY

8:05 AM



Monday, June 20, 2016

C

Send me an invoice for 60K.
30K line item for 16U, 15U
travel expenses, 30K for CA
Supreme Back to School
Event Sponsorship

12:44 PM

12:46 PM Ok got it

(Exhibit 2016-2D)

Carlton DeBose (grey)
Gary Franklin (yellow)

 Enter message



1:03 /

< **Carlton DeBose - Nike Grossroot...**
708 [REDACTED]



Left u a message on yesterday
about a few things. Any word on
a date I can expect to receive
payment?

7:38 AM

C

I'm not listening to a 2min 30 sec
message, you already know that.
Have you sent me an invoice?
Your normal next check will be
there every June around th

e 15th.

7:42 AM

Lol.. Also payment for Shaun date
and do I send a separate invoice?

7:43 AM

C

It can be sent in all one invoice. I
can hit you today to discuss the
amounts and then you can submit
the invoice

7:44 AM

Ok cool the sooner the better
bcuz Manning is on me as to
when and I have a deadline with
my cc

7:46 AM

The last I spoke to Coleen she
said that she was waiting on u or
Jamal to authorize the product
order that I am giving all on?

2016-3 Action

1. \$10,000 cash paid to Andrea Ayton, Nike EYB player DeAndre Ayton's Mother, in Phoenix, AZ on 6/29/2016.

Exhibits

Exhibit 2016-3A: California Supreme Bank of America statement confirms two (2) cash withdrawals in the amount of \$5,000 each in connection with the \$10,000 total cash paid to Andrea Ayton by Gary Franklin in Phoenix, AZ on 6/29/2016.

Exhibit 2016-3B: Text message on 6/27/2016 between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) in which DeBose directs Franklin fly to Phoenix on 6/29/2016 (to make Andre Ayton payment).

Exhibit 2016-3C: Email correspondence on 6/27/2016 from Carlton DeBose (Nike EYB) to Gabriela Olivares (Nike Sports Marketing) requesting travel arrangements for Gary Franklin to travel to Phoenix, AZ on 6/29/2016.

Exhibit 2016-3D: Text message on 6/29/2016 between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) on the morning Franklin arrived in Phoenix, wherein DeBose asks Franklin if he's made contact with Andrea Ayton yet?

Exhibit 2016-3E: Text message on 6/29/2016 between Andrea Ayton, mother of Nike EYB player DeAndre Ayton, and Gary Franklin (CA Supreme) at 9:41am, once Franklin arrived in Phoenix, confirming Andrea's address; and another text on the 6/30/2016, the next day, once Franklin returned to Los Angeles, discussing the trip.

(Exhibit 2016-3A)



Your checking account

CALIFORNIA SUPREME BASKETBALL | [REDACTED] | June 1, 2016 to June 30, 2016

Deposits and other credits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
06/28/16	CA TLR cash withdrawal from CHK 8037	-5,000.00
[REDACTED]	[REDACTED]	[REDACTED]
06/30/16	CA TLR cash withdrawal from CHK 8037	-5,000.00
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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(Exhibit 2016-3B)

Carlton DeBose (grey)
Gary Franklin (yellow)



10:51 PM

Carlton DeBose - Nike Grossroot...

708 [REDACTED]

Monday, June 27, 2016

C

Did you get the money from the invoice?

10:02 AM

Not yet but I just return back late yesterday so will check

10:55 AM

4:06 PM Received

C

Who can get on a flight to PHX for Wed from your program that you trust?

4:07 PM

It depends but for how long I maybe free?

4:10 PM

C

In and out same day

4:18 PM

Im open and free to go?

4:25 PM

C

Ok I'm going to have Gabby make you a flight for Wed.

4:26 PM

Ok let me and I'm assuming u will fill me in on my mission 🤔🤔

4:34 PM

C

Laughing yes sir.

4:34 PM

(Exhibit 2016-3C)

----- Forwarded Message -----

From: "Olivares, Gabriela" <[REDACTED]>
To: "Carlton.DeBose@nike.com" <[REDACTED]>
Cc: "calsupremebball" <[REDACTED]>
Sent: Mon, Jun 27, 2016 at 4:40 PM
Subject: Re:
Sure thing.

Gary – What are the travel dates (this Wednesday AM – 6/29)?

Can you please complete the info below as well?

Full Legal Name:
DOB:
Phone #:
Email Address:

Date of travel: Wednesday 6/29
Arrival Time PHX:
Depart Time PHX:
Airport Code: LAX?
Airline Preference:
Frequent Flyer #:
Seat Preference:

Thanks,

Gabby Olivares | Basketball Sports Marketing | [REDACTED]
NIKE, Inc. | www.nikeeyb.com



From: "DeBose, Carlton" <[REDACTED]>
Date: Monday, June 27, 2016 at 4:36 PM
To: Olivares Gabriela <[REDACTED]>
Cc: Gary Franklin <[REDACTED]>
Subject: <no subject>

Gabby,
I need for Gary to fly into PHX on Wed am and then fly back to LA a couple of hours later. Can you please make the travel arrangements for him? Thank you Gab

Carlton



(Exhibit 2016-3D)

Carlton DeBose (grey)
Gary Franklin (yellow)

10:07 PM

Carlton DeBose - Nike Grossroot...

708

Cool r u guys still coming down to
LA b4 peach?

4:36 PM

C I will be there Wed am and leave
Thurs. So let's meet when you get
back in town on Wed.

4:37 PM

4:40 PM Ok cool

Tuesday, June 28, 2016

If im there 2hrs to 3 hrs im good
I can go by my cousin store and
bounce if he's in town?

12:06 PM

C Ok perfect. Will hit Gabby to get a
tighter window

12:19 PM

12:23 PM

Wednesday, June 29, 2016

10:15 AM

Just landed

C Ok cool. Have you talked to
Andrea?

10:17 AM

Yes she gave me her address just
now

10:17 AM

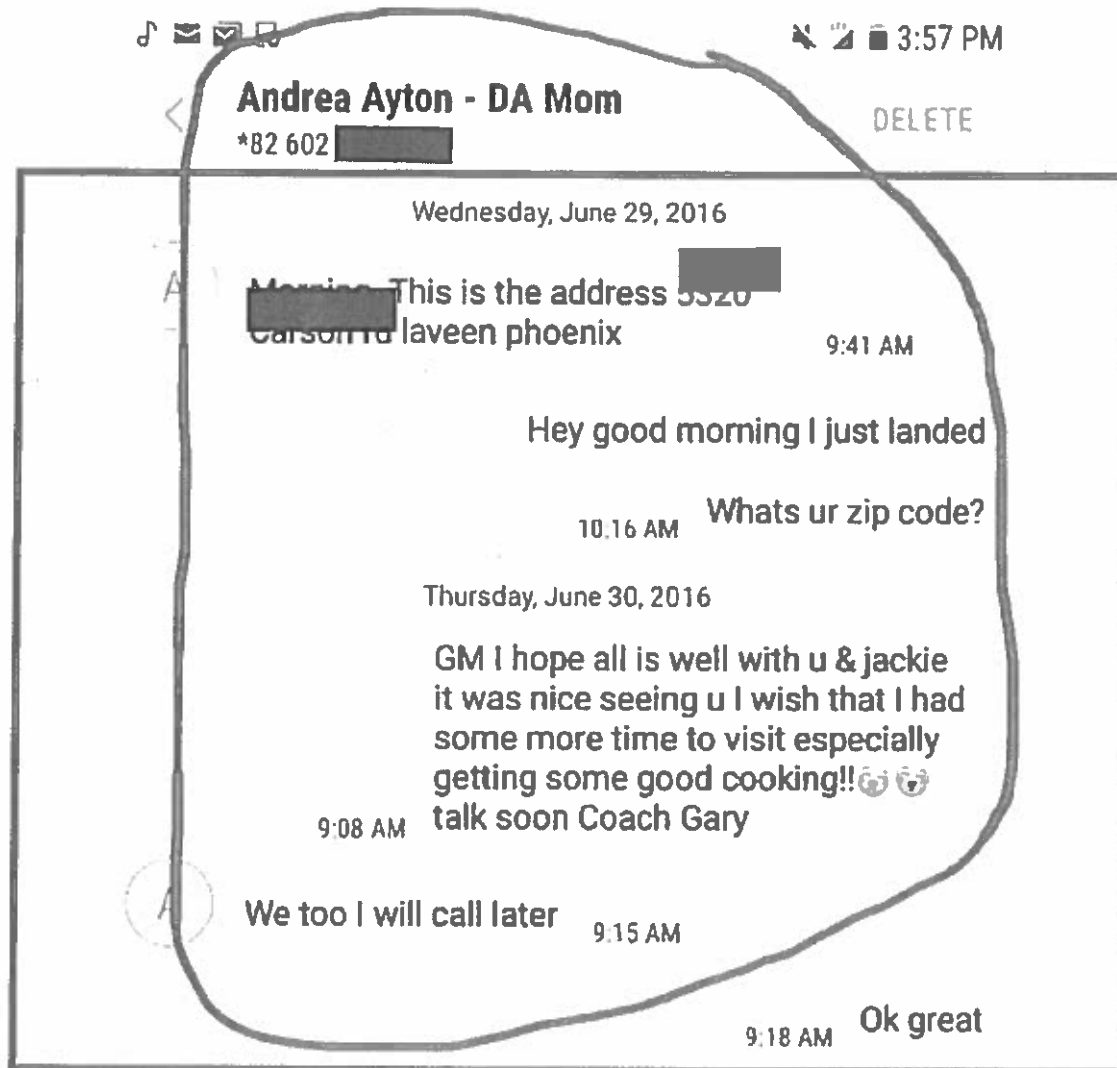
C Ok cool air

Enter message



(Exhibit 2016-3E)

Andrea Ayton (grey)
Gary Franklin (yellow)



Have u check Deandre in yet for his flight tomorrow? If not yet let me know so I can upgrade his seat for leg room bcuz I forgot to check him in earlier..

4:51 PM

A

Ok you can check him in

4:59 PM

5:25 PM Ok got it

Holiday Inn Express
EAST

2016-4 Action

1. \$10,000 check (of \$15,000 total) paid to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler," by California Supreme on 6/28/2016.

Exhibits

Exhibit 2016-4A: California Supreme Bank of America statement confirms check #1095 for \$10,000 cleared on 7/1/2016. This was the above-referenced check to Shaun Manning, Nike EYB player Brandon McCoy's "handler."

Exhibit 2016-4B: Text message on 6/2016 between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) in which DeBose confirms and directs Franklin to submit an invoice to Nike for payment AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler".

(Nike Elite Youth Basketball, California Supreme Youth Basketball, Shaun Manning, Brandon McCoy)

(Exhibit 2016-4A)

**CALIFORNIA SUPREME BASKETBALL**

July 1, 2016 to July 31, 2016

Your checking account

Withdrawals and other debits - continued[illegible]

Checks

Date	Check #	Amount
07/01/16	1095	-10,000.00
Total checks		-\$10,000.00
Total # of checks		1

Service fees

[REDACTED]

[REDACTED]

[REDACTED]

☒ [REDACTED]

☐ [REDACTED]

☐ [REDACTED]

☒ [REDACTED]


☒ [REDACTED]

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continued on the next page

(Exhibit 2016-4B)

Carlton DeBose (grey)
Gary Franklin (yellow)

 Enter message



* 1:03 /

< **Carlton DeBose - Nike Grossroot...**
708 [REDACTED]



Left u a message on yesterday
about a few things. Any word on
a date I can expect to receive
payment?

7:38 AM

C

I'm not listening to a 2min 30 sec
message, you already know that.
Have you sent me an invoice?
Your normal next check will be
there every June around th

e 15th.

7:42 AM

7:43 AM

Lol.. Also payment for Shaun date
and do I send a separate invoice?

C

It can be sent in all one invoice. I
can hit you today to discuss the
amounts and then you can submit
the invoice

7:44 AM

7:46 AM

Ok cool the sooner the better
bcuz Manning is on me as to
when and I have a deadline with
my cc

The last I spoke to Coleen she
said that she was waiting on u or
Jamal to authorize the product
order that I can give all on?

2016-5 Action

1. \$2,500 cash paid on 7/18/2016 to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler".

Exhibits

Exhibit 2016-5A: California Supreme Bank of America statement confirms \$5,000 cash withdrawal on 6/30/2016 to make two (2) separate \$2,500 cash payments to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler," on 7/8/2016 and 8/10/2017.

Exhibit 2016-5B: Text message (6/2016) between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) in which DeBose confirms and directs Franklin to submit an invoice to Nike for payment to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler".

Exhibit 2016-5C: Text message on 6/30/2016 between AAU basketball coach Shaun Manning, Nike EYB Player Brandon McCoy's "handler," and Gary Franklin (CA Supreme) discussing Manning's remaining \$5,000 payment (of \$15,000 total).

(Nike Elite Youth Basketball, California Supreme Youth Basketball, Shaun Manning, Brandon McCoy)

(Exhibit 2016-5A)



Your checking account

CALIFORNIA SUPREME BASKETBALL | [REDACTED] | June 1, 2016 to June 30, 2016

Deposits and other credits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
06/30/16	CA TLR cash withdrawal from CHK 8037	-5,000.00
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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(Exhibit 2016-5B)

Carlton DeBose (grey)
Gary Franklin (yellow)

 Enter message



* 1:03 /

< Carlton DeBose - Nike Grossroot...

708 [REDACTED]



Left u a message on yesterday
about a few things. Any word on
a date I can expect to receive
payment?

7:38 AM

C

I'm not listening to a 2min 30 sec
message, you already know that.
Have you sent me an invoice?
Your normal next check will be
there every June around th

e 15th.

7:42 AM

Lol.. Also payment for Shaun date
and do I send a separate invoice?

7:43 AM

C

It can be sent in all one invoice. I
can hit you today to discuss the
amounts and then you can submit
the invoice

7:44 AM

Ok cool the sooner the better
bcuz Manning is on me as to
when and I have a deadline with
my cc

7:46 AM

The last I spoke to Coleen she
said that she was waiting on u or
Jamal to authorize the product
order that I am giving all on?

(Exhibit 2016-5C)

Shaun Manning (grey)
Gary Franklin (yellow)

Sprint

3:16 PM

62%

Done

24 of 24

Thursday, June 30, 2016

im talking to mike we r going call
u now

11:46 AM

S

Bet

11:46 AM

Hey do u want me to get a money
order or cashier check and if so
who name do i put on it groundup
or urs ? They will only allow me to
get \$5k cash today

12:16 PM

At the bank now so need to know
or just do the rest later?

12:17 PM

12:19 PM Decision ??

I thought he said cash but u can
put it in my name

12:19 PM

S

LINCOLN PREP BOYS
BASKETBALL FOUNDATION
All caps

If u need to do it by check

12:20 PM

12:21 PM

Cashier's check or program ?

(Exhibit 2016-5C)

Shaun Manning (grey)
Gary Franklin (yellow)

Sprint

3:21 PM

62%

Done

23 of 25

1:47 PM

1:53 PM I can meet up right quick

1:54 PM And drop B bag to u?

S

Ok I can pull up 1:54 PM

S

On u

U home 1:55 PM

No omw but I have to roll
somewhere else

1:56 PM

S

Come to Marcs alley

Then 1:57 PM

S

What we doin wit the balance 1:58 PM

2:03 PM We r waiting to see if Carlton is
going to take care of it bro

2:14 PM How close r u to Marc house?

Here 2:16 PM

Ok on my way

2016-6 Action

1. \$5,000 (approximately) paid with CA Supreme credit cards for travel expenses in connection with DeAndre Ayton's family members, between 7/5/2016 – 7/11/2016.

Exhibits

Exhibits: CA Supreme credit card statements and travel agent invoices are forthcoming.

2016-7 Action

1. \$2,500 cash paid on 8/10/16 to AAU basketball coach, Shaun Manning, Nike elite player Brandon McCoy's "handler".

Exhibits

Exhibit 2016-7A: California Supreme Bank of America statement confirms \$5,000 cash withdrawal on 6/30/2016 to make two (2) separate \$2,500 cash payments to AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler," on 7/8/2016 and 8/10/2017.

Exhibit 2016-7B: Text message (6/2018) between Carlton DeBose (Nike EYB) and Gary Franklin (CA Supreme) in which DeBose confirms and directs Franklin to submit an invoice to Nike for payment AAU basketball coach, Shaun Manning, Nike EYB player Brandon McCoy's "handler".

Exhibit 2016-7C: Text message on 6/30/2016 between AAU basketball coach Shaun Manning, Nike EYB Player Brandon McCoy's "handler," and Gary Franklin (CA Supreme) discussing Manning's remaining \$5,000 payment (of \$15,000 total).

(Nike Elite Youth Basketball, California Supreme Youth Basketball, Shaun Manning, Brandon McCoy)

(Exhibit 2016-7A)



Your checking account

CALIFORNIA SUPREME BASKETBALL | [REDACTED]

June 1, 2016 to June 30, 2016

Deposits and other credits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
06/30/16	CA TLR cash withdrawal from CHK 8037	-5,000.00
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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May Lose Value

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28

(Exhibit 2016-7B)

Carlton DeBose (grey)
Gary Franklin (yellow)

 Enter message



   1:03 /



Carlton DeBose - Nike Grossroot...

708 [REDACTED]



Left u a message on yesterday
about a few things. Any word on
a date I can expect to receive
payment?

7:38 AM

C

I'm not listening to a 2min 30 sec
message, you already know that.
Have you sent me an invoice?
Your normal next check will be
there every June around th

e 15th.

7:42 AM

7:43 AM

Lol.. Also payment for Shaun date
and do I send a separate invoice?

C

It can be sent in all one invoice. I
can hit you today to discuss the
amounts and then you can submit
the invoice

7:44 AM

7:46 AM

Ok cool the sooner the better
bcuz Manning is on me as to
when and I have a deadline with
my cc

The last I spoke to Coleen she
said that she was waiting on u or
Jamal to authorize the product
order that I can give all on?

(Exhibit 2016-7C)

Shaun Manning (grey)
Gary Franklin (yellow)

Sprint

3:16 PM

62%

Done

24 of 24

Thursday, June 30, 2016

I'm talking to mike we r going call
u now

11:46 AM

S

Bet

11:46 AM

Hey do u want me to get a money
order or cashier check and if so
who name do I put on it groundup
or urs ? They will only allow me to
get \$5k cash today

12:16 PM

At the bank now so need to know
or just do the rest later?

12:17 PM

12:19 PM Decision ??

I thought he said cash but u can
put it in my name

12:19 PM

S

LINCOLN PREP BOYS
BASKETBALL FOUNDATION
All caps

If u need to do it by check

12:20 PM

12:21 PM

Cashier's check or program ?

(Exhibit 2016-7C)

Shaun Manning (grey)
Gary Franklin (yellow)

Sprint

3:21 PM

62%

Done

23 of 25

1:53 PM I can meet up right quick

1:54 PM And drop B bag to u?

S Ok I can pull up 1:54 PM

S On u

U home 1:55 PM

1:56 PM No omw but I have to roll
somewhere else

S Come to Marcs alley

Then 1:57 PM

S What we doin wit the balance 1:58 PM

2:03 PM We r waiting to see if Carlton is
going to take care of it bro

2:14 PM How close r u to Marc house?

Here 2:16 PM

Ok on my way

2017-1 Action

1. \$29,528.43 bank-wire (of \$30,000 total payment) on 4/11/2017 to Melvin McDonald, Nike EYB player Bol Bol's "handler," via McDonald's non-profit 501c3, American All-Star Basketball.

Exhibits

Exhibit 2017-1A: California Supreme Bank of America statement confirms \$36,000 Nike direct-deposit on 4/10/2016 (to cover the \$29,528.34 bank wire payment to Melvin McDonald, Nike EYB player Bol Bol's "handler," via McDonald's non-profit 501c3, American All-Star Basketball).

Exhibit 2017-1B: California Supreme Bank of America statement confirms bank-wire payment in the amount of \$29,528.34 made to American All-Star Basketball (Melvin McDonald's non-profit, 501c3) at Wells Fargo Bank on 4/11/2017, in connection with Nike EYB player Bol Bol.

(Exhibit 2017-1A)

**CALIFORNIA SUPREME BASKETBALL**

April 1, 2017 to April 30, 2017

Your checking account

Deposits and other credits

Date	Description	Amount
04/10/17	NIKE USA, INC. DES:6328833172 ID:1500798002 INDN:GARY L FRANKLIN CO ID:8931243023 CTX ADDITIONAL INFORMATION IS AVAILABLE FOR THIS PMT. CONTACT A TREASURY SALES OFFICER FOR ASSISTANCE.	36,000.00

Total deposits and other credits

Withdrawals and other debits

[illegible]

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TIP OF THE MONTH

Dreading the shredding?

Go paperless and make a statement.

- Your secure paperless statements don't need storing or shredding
- Get email reminders that link right to your statements for easy access
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(Exhibit 2017-1B)



CALIFORNIA SUPREME BASKETBALL

April 1, 2017 to April 30, 2017

Your checking account

Deposits and other credits

Date	Description	Amount
[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	
	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total deposits and other credits		[REDACTED]

Withdrawals and other debits

[illegible]

continued on the next page



Small Business Online Banking

TIP OF THE MONTH

Dreading the shredding?

Go paperless and make a statement.

- Your secure paperless statements don't need storing or shredding
- Get email reminders that link right to your statements for easy access
- View and download your business statements anytime, with no paper waste

Click **Profile & Settings** (in the upper right next to **Sign Out**) when logged in at bankofamerica.com/smallbusiness.



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2017-2 Action

1. A falsified invoice for \$15,000 submitted to Nike EYB on 6/12/2017 to cover an additional \$15,000 in payments to Melvin McDonald, Nike EYB player Bol Bol's "handler".

Exhibits

Exhibit 2017-1A: Falsified invoice for \$15,000 submitted to Nike EYB on 6/12/2017 by California Supreme, requesting \$15,000 for a 2017 Middle School Challenge, which was used to cover an additional \$15,000 in payments to Melvin McDonald, Nike EYB player Bol Bol's "handler" (See Exhibit 2017-2C).

Exhibit 2017-2B: California Supreme Bank of America statement confirms \$36,000 Nike direct-deposit to CA Supreme on 6/15/2017.

Exhibit 2017-2C: Caplifornia Supreme Bank of America statement confirms bank-wire payment in the amount of \$12,500 made to American All-Star Basketball (Melvin McDonald's non-profit, 501c3) at Wells Fargo Bank on 6/28/2017, in connection with Nike EYB Player Bol Bol.

Exhibit 2017-2D: Text message on 6/27/2017 between Jamal James (Nike EYB) and Gary Franklin (CA Supreme) in which James directs Franklin to pay Melvin McDonald \$12,500.

(Exhibit 2017-2A)

Invoice**California Supreme Basketball**

Bill To: NIKE Inc
 One Bowerman Drive Beaverton, OR 97005
 NIKE Inc Attn: Jamal James (EYBL Manager)
 California Supreme Summer Middle School Cl

Invoice No: 1
Date: June 12, 2017
Terms: NET 0
Due Date: June 12, 2017

Description	Quantity	Rate	Amount
California Supreme Summer 2017 Middle School Challenge Expense \$15,000	1	\$15,000.00	\$15,000.00*

* Includes non-taxable item

Attn: Jamal James Nike Inc

Subtotal	\$15,000.00
Includes TAX (0.00%)	\$0.00
Total	\$15,000.00
Paid	\$0.00

Balance Due	\$15,000.00
--------------------	--------------------

(Exhibit 2017-2B)

**CALIFORNIA SUPREME BASKETBALL**

June 1, 2017 to June 30, 2017

Your checking account

Deposits and other credits

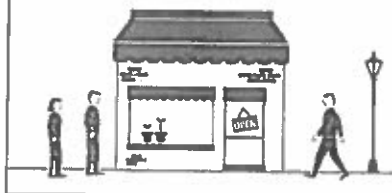
Date	Description	Amount
06/15/17	NIKE USA, INC. DES:6473106172 ID:1500021027 INDN:GARY L FRANKLIN CO ID:8931243023 CTX ADDITIONAL INFORMATION IS AVAILABLE FOR THIS PMT. CONTACT A TREASURY SALES OFFICER FOR ASSISTANCE.	15,000.00

Total deposits and other credits

Withdrawals and other debits

[illegible]

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2017-3 Action

1. \$12,500 bank-wire payment on 6/28/2017 to Melvin McDonald, Nike EYB player Bol Bol's "handler," via McDonald's non-profit 501c3, American All-Star Basketball.

Exhibits

Exhibit 2017-1A: California Supreme Bank of America statement confirms \$15,000 Nike direct-deposit on 6/15/2017 per invoice (See Exhibit 2017-2A) to cover \$12,500 bank wire payment (of \$15,000 additional payment) to Melvin McDonald, Nike EYB player Bol Bol's "handler".

Exhibit 2017-3B: California Supreme Bank of America statement confirms bank-wire payment in the amount of \$12,500 (of \$15,00 payment) made to American All-Star Basketball (Melvin McDonald's non-profit, 501c3) at Wells Fargo Bank on 6/28/2017, in connection with Nike EYB Player Bol Bol.

Exhibit 2017-3C: Text message on 6/27/2017 between Jamal James (Nike EYB) and Gary Franklin (CA Supreme) in which James directs Franklin to pay Melvin McDonald \$12,500.

(Exhibit 2017-3A)



Your checking account

CALIFORNIA SUPREME BASKETBALL 1

June 1, 2017 to June 30, 2017

Deposits and other credits

Date	Description	Amount
06/15/17	NIKE USA, INC. DES:6473106172 ID:1500021027 INDN:GARY L FRANKLIN CO ID:8931243023 CTX ADDITIONAL INFORMATION IS AVAILABLE FOR THIS PMT. CONTACT A TREASURY SALES OFFICER FOR ASSISTANCE.	15,000.00

Total deposits and other credits

Withdrawals and other debits

[illegible]

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(Exhibit 2017-3C)

Jamal James (grey)
Gary Franklin (Blue/Green)

